Email B. Group 012. Fruiting Vegetables, Cucurbits - Summaries

Option 1: 11A. Cucumber and Summer Squash 11B. Melons 11C. Winter Squash	Option 2 (ICGCC): 11A. Melon 11B. Squash/Cucumber
Option 3 (edible peel vs inedible peel): 11A. Cucumber and Summer Squash 11B. Melons and Pumpkins	Option 4: 11A. Cucumber and Melons 11B. Squashes
Option 5: No subgroups	

What was the rationale for separating melon and winter squash?	
Country	Response
Canada:	Cucumber and summer squash represent a worse-case scenario, due to their smaller size and the whole commodity is consumed, while winter squash is larger and only the interior fruit is consumed. No exceedances of MRLs on winter squash have been observed, therefore the use of residue data from cucumber and summer squash adequately covers residues in winter squash and pumpkins.
Chile:	Cited GAP, potential for pesticide residue, production practices, maturity and morphology.
Ecuador:	Based on consumption, winter squash is consumed as a vegetable in an immature stage as a vegetable in soups or stews, while melon is consumed ripe and without peel.
European Union:	Separating melons and winter squash is not supported by the EU.
India:	Melons are eaten raw, while winter squashes are eaten after cooking in India.
Indonesia:	Cited (1) different potential for pesticide residue, (2) different peel texture, (3) different GAP, and (4) different residue behavior.
Japan	Supports option 1, citing differences in consuming melons fresh after peeling and winter squashes are cooked (simmered winter squash). Although mature fruit of winter squash are often too tough to consume, peels of winter squash varieties are widely consumed in Japan.
New Zealand:	Separating melons and winter squash is not supported.
United States:	Based on the criteria for the selection of representative commodities, melons, summer squash and cucumber are adequate representative commodities for cucurbits.

What criteria were used to separate or combine melon and winter squash?	
Country	Response
Canada:	To provide flexibility for setting subgroup tolerances and because of taxonomic differences between melons and winter squash.
Chile:	Considers 3 subgroups appropriate and representative.
Ecuador:	Melon peel is not consumed, while winter squash is eaten with peel as a vegetable.
European Union:	The EU supports combining melons and winter squash because of similar morphology and edible parts, which results in similar pesticide exposure and risk assessment. Both melons and winter squash have an inedible peel, rough surface and similar surface area / mass ratio.
India:	Melons are eaten peeled and not cooked, while winter squashes are peeled and cooked in India and other countries.
Japan:	The edible portion.
Indonesia:	Cited (1) taxonomy (different species), (2) morphology, (3) melons consumed as fresh fruit and immature fruit consumed as fresh vegetables, while winter squash are cooked and sometimes cooked without peeling.
New Zealand:	Supports including melons and winter squashes in the same "inedible peel" subgroup as the GAPs are likely to be similar, with similar morphologies and same edible portion.
United States:	The US separates melon and winter squash and summer squash represents winter squash. Winter squash is included in the summer squash / cucumber subgroup based on (1) similar potential for residues, (2) similar production practices and growth habits, (3) similar GAP and pest problems, (4) similar residue behavior. Residues for winter squash are expected to be lower than summer squash / cucumber due to the typical longer PHI for winter squash. In addition due to surface area to mass ratios, pesticide residues on cucumber and squash are expected to be higher than winter squash and therefore protective. Consumption of peels in cucumber and summer squash represent a worse-case regarding pesticide exposure.

Was commodity sp commodities?	pecific residue data considered versus extrapolation from other
Country	Response
Canada:	Review of Codex MRLs for the group indicate that highest residues were found in melons. A comparison of EU MRLs between summer squashes and pumpkins / winter squashes indicted that MRLs were the same for the majority of active ingredients. Only 65 out of 453 were different (14%). Of those MRLs that were different summer squash had a higher MRL than winter squash / pumpkin in 72% of the cases.
Chile:	No comments.
Ecuador:	Extrapolation data not considered.
European Union:	The EU provided spreadsheets comparing 29 pesticides approved for cucurbits, both edible and inedible. With similar GAPs, in 10 cases, the MRL of cucumber is lower than the MRL of melons and in 8 cases the MRL of cucumber is higher than the MRL of melons. Based on examining two fungicides and two insecticides, the EU concluded that the data confirm an inconsistent and not always comparable MRLs and GAPs of edible and inedible peel, necessitating creating two distinct subgroups.
India:	
Indonesia:	None used.
Japan:	Provided a table of 45 Codex MRLs for Fruiting vegetables, cucurbits. 35 group MRLs were established based on residue data for cucumbers, summer squash and melons. 4 group MRLs were established based on residue data for only cucumber and melons. 3 group MRLs were based on only winter squashes or pumpkins. For 3 pesticides median residues of winter squashes are within the highest and lowest median residues of cucumber, summer squash or melons.
New Zealand:	Extrapolation based on similar morphology and GAP. Dietary risk assessment is simplified by separating commodities with edible and inedible peels. When commodities are consumed both with and without peel, separate commodity codes could be used, for example edible-peeled commodities as 'Commodity (immature)'.
United States:	In a crop grouping scheme used since 1995 in the US, there are no reports of over tolerance in the Pesticide Data Program to suggest that the current US crop grouping / subgroups is inappropriate or under estimates risk.

Regardless of the number of subgroups can sufficient flexibility be proposed in the Principles and Guidance for Selection of Representative Commodities to avoid additional data generation?

Country	Response
Canada:	Cucumber and summer squash represent a worse-case scenario, so additional residue data for winter squash is unnecessary. For risk assessment purposes, monitoring data can be used to refine risk assessments. The purpose of crop grouping is to minimize the number of representative crops, while maximizing the number of additional crops that benefit from the crop grouping concept and option 1 goes against this purpose. Option 1 requires the generation of additional residue data, which increases the regulatory burden. There have been no MRL issues due to the lack of a separate winter squash subgroup.
Chile:	No comments.
Ecuador:	Difficult without additional information.
European Union:	A compromise solution can be found provided the main criteria for the choice of representative commodities are respected.
India:	Option 2 combines 3 subgroups into 2 subgroups based on consumption (raw, melon subgroup) or cooked (squash/cucumber).
Indonesia:	Include commodities in a subgroup based on their morphology and phylogenetic relationships. For example cucumber and melon are in the same genus (<i>Cucumis</i>).
Japan:	Cucumbers and summer squash are harvested almost every day (immature fruit), while melons and winter squash are harvested after they reach full size. Dilution of pesticide residue is also different between cucumber / summer squash and melon / winter squash. Therefore residue trials are needed for both cucumber / squash and melon / winter squash. Residue data for melons can be extrapolated to winter squash and vice versa.
New Zealand:	If Option 1 is advanced instead of Option 3, data from melons could be used to support MRLs for the winter squash subgroup. Data from cucumber / summer squash should not be used to support MRLs for melons, winter squash or pumplin.
United States:	

Please describe a compromise solution that would allow CCPR to decide on subgroups for Cucurbits in terms of generation of additional residue data and risk assessment.

Country	Response
Canada:	Option 3 . The option would not results in the need for an additional representative commodity and avoids the generation of additional data. Melon as the representative commodity for the Melon and Pumpkin subgroup will cover potential residues in winter squashes / pumpkins.
Chile:	No comments.
Ecuador:	Supports a comparison of residue data from edible peel versus inedible peel. [Option 3 is essentially edible peel vs inedible peel]
European Union:	Option 3 is the preferred proposal. Option 1 and 4 do not provide clear rationale. The subgroups for Option 3 could be renamed to 11A. Cucumbers and similar species and 11B. Melons and similar species; avoiding pumpkins as a representative commodity. Extrapolation could be allowed from melons to pumpkins.
India:	
Indonesia:	Option 4
Japan:	Option 1 . While residue data for melons can be extrapolated to winter squashes, assuming the same GAP, melons and winter squash should be classified into separate subgroups to refine exposure assessments.
New Zealand:	No suggestion.
United States:	Although the US supports Option 2, the US could support Option 3 if a compromise is required. The US is opposed to an option that would require the generation of additional data on another representative commodity. Crop grouping allows the use of crop groups to establish tolerances on multiple commodities, especially minor and specialty crops, based on data from representative commodities. Registrants are unlikely to spend the fund needed to conduct addition residue studies. The creation of a third subgroup is no consistent with the concept of representative commodities. Additional residue data will be required on winter squash if a third subgroup is created.

Email B. Group 012. Fruiting Vegetables, Cucurbits – Proposed Compromise:

- 11A. Cucumber and Summer Squash
- 11B. Melons

Comments that were supportive of Option 3 include:

- (1.) A review of Codex MRLs for the group indicates highest residues found in melons [Canada].
- (2.) A review of Codex MRLs for edible peel and inedible peel Cucurbits indicates that two distinct subgroups are needed for edible and inedible peel Cucurbits [EU].
- (3.) No exceedances of MRLs on winter squashes have been observed [Canada].
- (4.) The use of residue data from cucumber and summer squash adequately covers residues in winter squash and pumpkins [Canada].
- (5.) Monitoring data can be used to refine risk assessments for winter squashes and pumpkins [Canada].
- (6.) Residue data for melons can be extrapolated to winter squash and vice versa [Japan].
- (7.) Extrapolation could be allowed from melons to pumpkins [EU].
- (8.) Combining melons and winter squash is supported because of similar morphology and edible parts [EU].
- (9.) Supports combining melons and winter squashes because GAPs similar [New Zealand].
- (10.) Option 3 avoids the need for an additional representative commodity and the generation of additional data [Canada].
- 11.) For commodities that are consumed both with and without the peel, separate commodity codes can be used, i.e. "Commodity (immature)" [New Zealand].

Note that *Trichosanthes edulis* Rugayah and *Trichosanthes laeoica* C. Y. Cheng & Lu Q. Huang have been added as "Gourds, other" in 11A (unless common names can be identified).

Also note that Indian round gourd now references Gourd, round, as Praecitrullus fistulosus (Stocks) Pangalo is a synonym of Benincasa fistulosa

Also note that Malabar gourd was not transferred to 11B as Malabar gourd is consumed both as both an immature fruit similar to summer squash and also as a winter squash.

FRUITING VEGETABLES, CUCURBITS

Class A

Group 011

Type 2 Vegetables Group 011 Group Letter Code VC

Group 011 Fruiting vegetables, Cucurbits are derived from the immature or mature fruits of various plants, belonging to the botanical family Cucurbitaceae: usually these are annual vines or bushes.

These vegetables are fully exposed to pesticides during the period of fruit development.

The edible portion of those fruits of which the inedible peel is discarded before consumption is protected from most pesticides, by the skin or peel, except from pesticides with a systemic action.

The entire fruiting vegetable or the edible portion after discarding the inedible peel may be consumed in the fresh form or after processing. The entire immature fruit of some of the fruiting vegetables species may be consumed, whereas only the edible portion of the mature fruit of the same species, after discarding the then inedible peel, is consumed.

The group Fruiting vegetables, Cucurbits is divided in 2 subgroups:

Fruiting vegetables, Cucurbits

11A Fruiting vegetables, Cucurbits – Cucumbers and Summer squashes

11B Fruiting vegetables, Cucurbits - Melons

<u>Portion of the commodity to which the MRL applies (and which is analysed)</u>: **Whole commodity after removal of stems.**

2.00.00	
Code No.	Commodity
VC 0045	Fruiting vegetables, Cucurbits
Subgroup 011A Fru	uiting vegetables, Cucurbits – Cucumbers and Summer squashes
Code No.	Commodity
VC 2039	Fruiting vegetables, Cucurbits - Cucumbers and Summer squashes
	(includes all commodities in this subgroup)
VC 2652	Alcayota, see Gourd Malabar, VC 2657
VC 0420	Balsam apple
	Momordica balsamina L.
VC 4197	Bitter melon
	Momordica charantia L.
VC 4193	Bitter cucumber, see Bitter melon, VC 0421
VC 4195	Bitter gourd, see Bitter melon, VC 0421
VC 0421	Balsam pear, see Bitter melon, VC 0421
VC 0422	Bottle gourd
	Lagenaria siceraria (Molina) Standl.;
	syn: L. vulgaris Ser.; L. leucantha (Duch.) Rusby
VC 0423	Chayote

	Sechium edule (Jacq.) Schwartz;
	syn: <i>Chayota edulis</i> Jacq.
VC 2656	Chieh qua (young Chinese waxgourd)
	Benincasa hispida (Thunb.) Cogn. var. chieh-qua How
VC 2657	Chinese cucumber
	Trichosanthes kirilowii Maxim.
VC 4203	Christophine, see Chayote, VC 0423
VC 4207	Courgette, see Squash, Summer, VC 0431
VC 0424	Cucumber
	Cucumis sativus L.; English and forcing cucumber cultivars
VC 2660	Cucumber, brown-netted, see Cucumber, VC 0424
	Cucumis sativus L. var. sikkimensis
VC 2661	Cucumber, exploding
	Cyclanthera brachystachya (Ser.) Cogn.
VC 2662	Cucumber, stuffing
	Cyclanthera pedata (L.) Schrad.
VC 4209	Cucuzzi, see Bottle gourd, VC 0421
VC 2663	Gac
	Momordica cochinchinensis (Lour.) Spreng.
VC 0425	Gherkin
	Cucumis sativus L.; pickling cucumber cultivars
VC 0426	Gherkin, West Indian
	Cucumis anguria L.
VC 2665	Gourd, bitter snake
	Trichosanthes tricuspidata Lour.
VC 2666	Gourd, buffalo
	Cucurbita foetidissima Kunth
VC 2667	Gourd, club, see Snake gourd, VC 0430
VC 2668	Gourd, fluted
	Telfairia occidentalis Hook. f.
VC 2669	Gourd, Malabar
	Cucurbita ficifolia Bouché
VC 2673	Gourds, other, including
	Trichosanthes edulis Rugayah
	Trichosanthes laeoica C. Y. Cheng & Lu Q. Huang

VC 2670	Gourd, pointed
	Trichosanthes dioica Roxb.
VC 2671	Gourd, round
	Benincasa fistulosa (Stocks) H. schaef. & S.S. Renner
VC 2672	Gourd, Xishuangbanna, see Cucumber, VC 0424
	Cucumis sativus L. var. xishuangbannansis ined.
VC 2675	Indian round gourd, see Gourd, round, VC 2659
	Praecitrullus fistulosus (Stocks) Pangalo
VC 2676	Indian spine gourd
	Momordica dioica Roxb. Ex Willd.
VC 2677	lvy gourd
	Coccinia grandis (L.) Voigt
VC 2661	Japanese snake gourd
	Trichosanthes ovigera Blume
VC 0427	Loofah, Angled
	Luffa acutangula (L.) Roxb.
VC 0428	Loofah, Smooth
	Luffa aegyptiaca Mill.
	syn: Luffa cylindrica (L.) M. J. Roem;
VC 4213	Marrow, see Squash, Summer, VC 0431
	Cucurbita pepo L., several cultivars
VC 4241	Patisson, see Squash, Summer, VC 0431
VC 4243	Sinkwa or Sinkwa towel gourd, see Loofah, Angled, VC 0427
VC 0430	Snake gourd
	Trichosanthes cucumerina L.;
	syn: <i>T. anguina</i> L.
VC 2688	Spiny bitter gourd, see Gac, VR 2654
VC 4245	Sponge gourd, see Loofah, Smooth, VC 0428
VC 0431	Squash, Summer
	Cucurbita pepo L.; Cucurbita pepo L. subsp. pepo; Cucurbita pepo L. subsp. Ovifera (L.) Harz; several cultivars, immature
VC 4249	Squash, White Bush, see Squash, Summer, VC 0431
VC 2689	Sweet gourd, see Gac, VR 2654
VC 2690	Тасасо
	Sechium tacaco (Pittier) C. Jeffrey

VC 4253	Vegetable sponge, see Loofah, Smooth, VC 0428
VC 2692	Wax gourd (immature fruit), see Chieh qua, VC 2650
VC 4257	West Indian gherkin, see Gherkin, West Indian, VC 0426
VC 4261	Zucchetti, see Squash, Summer, VC 0431
	Zapallito italiano [zucchini], see Squash, Summer, VC 0431
VC 4263	Zucchini, see Squash, Summer, VC 0431

Subgroup 011B Fruiting vegetables, Cucurbits - Melons

Code No.	Commodity
VC 2040	Fruiting vegetables, Cucurbits – Melons, Pumpkins and Winter Squashes
	(includes all commodities in this subgroup)
VC 2650	Acorn squash, see Winter squash, VC 0433
	Cucurbita pepo var. ovifera (L.) Harz
VC 2651	African horned melon
	Cucumis metuliferus E. Meyer ex Naudin
VC 2653	Butternut squash, see Winter squash, VC 0433
	Cucurbita moschata Duchesne
VC 2654	Calabaza, see Winter squash, VC 0433
	Cucurbita pepo L.
VC 4199	Cantaloupe, see Melons, except Watermelon, VC 0046
	Cucumis melo L., subsp. melo var. cantaloupo Ser.
VC 2671	Casabanana
	Sicana odorifera (Vell.) Naudin
VC 4201	Casaba or Casaba melon, see Melons, except Watermelon, VC 0046
VC 2655	Cheese pumpkin, see Pumpkins, VC 0429
	Cucurbita moschata Duchesne
	Cucumis melo L., var. inodorus H. Jacq.
VC 2658	Chinese wax gourd, see Wax gourd, VC 0434
VC 4205	Citron melon, see Watermelon, VC 0432
	Citrullus lanatus (Thunb.) Mansf., var. edulis;
	syn: Citrullus edulis Pang.
VC 2659	Cucumber, Armenian, see Melon, Serpent
VC 4211	Cushaws, see Pumpkins, VC 0429
	Mature cultivars of Cucurbita argyrosperma C. Huber
VC 2664	Giant pumpkin, see Pumpkins, VC 0429

	Cucurbita moschata Duchesne
VC 2674	Hubbard squash, see Winter squash, VC 0433
	Cucurbita maxima Duchesne
VC 2678	Kiwano, see African horned melon, VC 2670
VC 2672	Korean Melon
	Hybrid cultivars of Cucumis melo L. subsp. agrestis (Naudin) Pangalo
VC 2679	Marrow (late variety),see Pumpkins, VC 0429
VC 0046	Melons, except Watermelon
	Several var. and cultivars of Cucumis melo L.
VC 4215	Melon, Crenshaw, see Melons, except Watermelon, VC 0046
	Cultivar of Cucumis melo L. subsp. melo var. inodorus H. Jacq.
VC 2680	Melon, Dudaim, see Melons, except Watermelon, VC 0046
	Cucumis melo L., var. dudaim (L.) Naudin.
VC 2681	Melon, Garden, see Melon, Mango
VC 4217	Melon, Honey Ball, see Melons, except Watermelon, VC 0046
	Cultivar of Cucumis melo L., subsp. melo var. cantaloupo Ser.
VC 4219	Melon, Honeydew, see Melons, except Watermelon, VC 0046
	Cultivar of Cucumis melo L., var. inodorus Naud.
VC 4221	Melon, Mango, see Vine peach
VC 2682	Melon, nara
	Acanthosicyos horridus Welw. ex Benth. & Hook. f.
VC 4225	Melon, Oriental Pickling
	Cucumis melo L. subsp. agrestis (Naudin) Pangalo var. conomon (Thunb.) Makino
VC 4227	Melon, Persian, see Melons, except Watermelon, VC 0046
	Cultivar of Cucumis melo L., subsp. melo var. cantaloupo Ser.
VC 4229	Melon, Pomegranate, see Melon, Dudaim
VC 4231	Melon, Serpent, see Melons, except Watermelon, VC 0046
	Cucumis melo L., var. flexuosus (L.) Naudin.
VC 4233	Melon, Snake, see Melons, except Watermelon, VC 0046
	synonym of Melon, Serpent
VC 2683	Melon, Snap, see Melons, except Watermelon, VC 0046
	Acanthosicyos horridus Welw. Ex Benth. & Hook. f.
VC 4235	Melon, White-skinned, see Melons, except Watermelon, VC 0046
	Cultivars of Cucumis melo L. subsp. melo var. inodorus H. Jacq.
VC 4237	Melon, Winter, see Melons, except Watermelon, VC 0046

	synonym of Melons, White-skinned, see there
VC 4239	Muskmelon, see Melons, except Watermelon, VC 0046
	Cultivar of Cucumis melo L.; C. melo L. var. melo
VC 2684	Oriental melon, see Korean melon, see VC 2672
VC 2685	Pumpkin, see Pumpkins, VC 0429
	Cucurbita pepo L.; C. pepo L. subsp. pepo
VC 0429	Pumpkins
	Mature cultivars of <i>Cucurbita maxima</i> Duchesne; <i>Cucurbita argyrosperma</i> C. Huber; <i>C. moschata</i> Duchesne; <i>C. pepo</i> L. and <i>C. pepo</i> L. subsp. <i>pepo</i>
VC 2686	Silver Seed gourd, see Pumpkins, VC 0429
	Cucurbita argyrosperma C. Huber
VC 2687	Spaghetti squash, see Winter squash, VC 0433
	Cucurbita pepo subsp. pepo
VC 2691	Vine peach, see Melons, except Watermelon, VC 0046
	Cucumis melo L. subsp. agrestis (Naudin) Pangalo var. chito (C. Morren) Naudin
VC 0432	Watermelon
	Citrullus lanatus (Thunb.) Matsum. & Nakai var. lanatus
	syn: C. vulgaris Schrad.; Colocynthis citrullus (L.) O. Ktze.
VC 4255	Wax gourd
	Benincasa hispida (Thunb.) Cogn.;
	syn: <i>B. cerifera</i> Savi
VC 0433	Winter squash, see also Pumpkins VC 0429
	Mature cultivars of <i>Cucurbita maxima</i> Duchesne; <i>C. maxima</i> subsp. <i>maxima</i> ; <i>C. moschata</i> Duchesne;. <i>C. pepo</i> (L.); <i>Cucurbita pepo</i> subsp. <i>pepo</i> and <i>Cucurbita pepo</i> var. <i>ovifera</i> (L.) Harz

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